

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
  
Debtors. <sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**SUPPLEMENTAL DECLARATION OF PATRICK FITZGERALD IN SUPPORT OF  
APPLICATION OF DEBTORS TO RETAIN AND EMPLOY SKADDEN**

I, Patrick Fitzgerald, declare:

1. I am a partner in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP (together with its affiliates, “Skadden” or the “Firm”), proposed special counsel to the above-captioned debtors (the “Debtors”) in the above-captioned bankruptcy cases, which maintains an office for the practice of law at, among other places, 155 N. Wacker Drive, Chicago, Illinois 60606.

2. I am a practicing member in good standing of the bars of the States of Illinois and New York. I am admitted to practice before the United States Supreme Court, the United States District Courts for the Southern and Eastern Districts of New York, the Northern District of Illinois, the Northern District of Indiana, and the Eastern District of Wisconsin, as well as the United States Court of Appeals for the Second Circuit.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P., Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

3. On September 15, 2019 (the “Petition Date”), each of the above-captioned debtors (collectively, the “Debtors”) commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). On November 6, 2019, the Debtors filed an application to employ and retain Skadden as special counsel to the Debtors [Docket No. 438] (the “Application”) pursuant to § 327(e) of the Bankruptcy Code, rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of New York.

4. My declaration in support of the Application (the “Original Declaration”) was attached to the Application as Exhibit A. On November 25, 2019, the Court entered the *Order Granting Application Authorizing the Retention and Employment of Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel to the Debtors Nunc Pro Tunc to the Petition Date* [Docket No. 545] (the “Retention Order”).

5. In connection with the Application and the Retention Order, I submit this supplemental declaration (this “Supplemental Declaration”) to provide additional disclosures in accordance with rules 2014(a) and 2016(b) of the Bankruptcy Rules and as required under the Retention Order.

6. In the Original Declaration, I disclosed Skadden’s hourly billing rates in effect at that time for the Skadden professionals expected to spend significant time on the engagement. I also disclosed that the billing rates are subject to periodic increase in the normal course of Skadden’s business. Pursuant to the Retention Order, Skadden must provide notice of changes to its billing rates during the Chapter 11 Cases. Skadden’s billing rates that are effective beginning January 1, 2020 for the Skadden professionals expected to spend significant

time on the engagement range from \$1,125 to \$1,695 for partners, \$475 to \$1,270 for associates and special counsel, and \$240 to \$430 for paralegals.<sup>2</sup>

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<sup>2</sup> Consistent with its prior agreement, Skadden has agreed to continue to provide a volume discount. Specifically, Skadden agreed to provide a discount of 8% for work that increases to 11% and 14% once fees reach \$4 million and \$8 million, respectively. These thresholds are calculated on a calendar year basis and re-set annually.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief, and after reasonable inquiry.

Dated: Chicago, Illinois  
March 16, 2020

/s/ Patrick Fitzgerald  
Patrick Fitzgerald

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